

October 24, 2023

Jones
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Hon. Steven L. Tiscione
Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Request for Remote Links for 11/07/2023 Settlement Conference in *Hammock et al. v. Moving State to State, LLC*, No. 18 Civ. 05628 (RPK) (SLT)

Dear Magistrate Judge Tiscione:

Per this Court's Scheduling Order entered on October 12, 2023, Plaintiffs' Counsel would like to request that a telephone number or video-conference link be provided to Counsel to allow our clients to attend the settlement conference scheduled for November 7, 2023.

Counsel for both parties are in agreement that all parties should be required to attend the settlement conference, but as the Individual Plaintiffs reside out of state (Mr. Hammock resides in Oregon, Ms. Bynum in Virginia, and Ms. Ulerio-Urbaez in Massachusetts), it would be extremely burdensome for them to attend the conference in-person.

Plaintiffs' Counsel would also like to request that Counsel be allowed to attend the settlement conference remotely. Both Counsel's offices are located in Manhattan, and Mr. Deeban Siva, the attorney attending the conference on behalf of Plaintiffs, lives in Jersey City, NJ. His commute to Central Islip will be at least a little over 2 hours one-way, and that's assuming the best possible traffic conditions.

Alternatively, if it is possible for the Court to reschedule the settlement conference to a date (among those agreed to by both parties) during which the Court is meeting in Brooklyn, this would lighten Mr. Siva's commute to the conference, allowing him to attend in-person with greater ease.

Thank you for your attention to this matter.

Respectfully,



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